

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

IN RE:

**KENNETH A. IMES, JR
and MICHELLE L. IMES**

Debtors

**: Chapter 7
:
: BANKRUPTCY NO. 24-14566 (PMM)
:
:**

DEBTORS ANSWER TO THE ORDER TO SHOW CAUSE

COMES NOW, the Debtors, Kenneth A. Imes, Jr., and Michelle L. Imes, by and through their Attorney, Joseph T. Bambrick, Jr., who files this Answer to the Order to Show Cause and in support of thereof says:

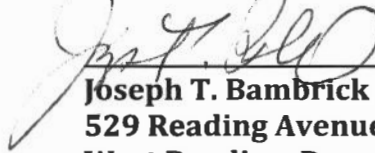
1. It is Admitted that Counsel failed to appear for a hearing in regard to the Debtors' Motion to Withdraw from Chapter 7 Bankruptcy; however, Counsel intended to show no disrespect to this Court's Order, and/or indifference to the needs of the clients because:
 - a. Counsel was in a multi-day trial with an attachment Order from the Court that Counsel must be present for trial (see attached Exhibit "A").
 - b. Counsel requested a continuance of this Court's hearing on Thursday, February 20th, 2025 (see attached Exhibit "B").
 - c. Counsel's request for a continuance in this instant matter was Denied on Thursday, February 20th, 2025 (see attached Exhibit "C").

WHEREFORE, Counsel respectfully requests that this Court;

- a. Reschedule the hearing in this mater;
- b. Grant such other relief as this Court deems fitting and just.

Date: March 19, 2025

Respectfully submitted by,



**Joseph T. Bambrick Jr., Esquire
529 Reading Avenue
West Reading, Pennsylvania 19611
P. (610) 372-6400
F. (610) 372-9483
E. No1jtb@aol.com**

LAURIE L. GARMAN,
Plaintiff,

v.

JOHN KOZLOWSKI, T.A.
KOZLOWSKI, INC.,
Defendant.

IN THE COURT OF COMMON PLEAS
OF BERKS COUNTY, PENNSYLVANIA
CIVIL ACTION - LAW
DOCKET NO. 24-10926

ASSIGNED TO: JAMES E. GAVIN, J.

ATTORNEY ATTACHMENT ORDER

AND NOW, this 6th Day of February 2025, Attorney Benjamin J. Lewis and Attorney Joseph T. Bambrick, Jr. are hereby ATTACHED for trial. Trial shall be held in Courtroom 4A of the Berks County Services Center in Reading, Berks County, Pennsylvania, and the attorneys are ATTACHED during the following dates and times:

1. February 24, 2025 from 1:30 p.m. until 5:00 p.m.
2. February 25, 2025 from 9:00 a.m. until 5:00 p.m.

BY THE COURT:



JAMES E. GAVIN, J.

EXHIBIT "A"



From: "Joseph T. Bambrick Jr." <no1jtb@juno.com>

To: Sara_Roman@paeb.uscourts.gov

Sent: Thu, Feb 20, 2025 01:50 PM

Subject: 24-14066/ 24-14566

Attached Order.pdf (112KB)

We will need to reschedule both hearings on 2/25/2025 @11am. I have a conflict. I attached the order.

Thanks!

EXHIBIT "B"



From: Sara Roman <Sara_Roman@paeb.uscourts.gov>

To: "Joseph T. Bambrick Jr." <no1jtb@juno.com>

Sent: Thu, Feb 20, 2025 04:17 PM

Subject: RE: 24-14066/ 24-14566

The Court denied your request.

*Sara I. Roman
Courtroom Deputy for the Honorable Patricia M. Mayer
United States Bankruptcy Court
Eastern District of Pennsylvania
Telephone: (610) 208-5048*

From: Joseph T. Bambrick Jr. <no1jtb@juno.com>

Sent: Thursday, February 20, 2025 1:51 PM

To: Sara Roman <Sara_Roman@paeb.uscourts.gov>

Subject: 24-14066/ 24-14566

CAUTION - EXTERNAL:

We will need to reschedule both hearings on 2/25/2025 @11am. I have a conflict. I attached the order.

Thanks!

CAUTION - EXTERNAL EMAIL: This email originated outside the Judiciary. Exercise caution when opening attachments or clicking on links.

EXHIBIT "C"